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DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

April 15, 2002

Mr. Ed Tyner
89th Regional Support Command
AFRC-CKS-ENE (Tyner)
3130 George Washington Blvd
Wichita, KS 67210

7ES

Site:	SLOP-Harley
File No:	MO 3210090038
Section:	1.3
Date:	4-15-02

RE: Preliminary Assessment/Site Inspection Report, Former St. Louis Ordnance Plant, St. Louis Missouri

Dear Mr. Tyner:

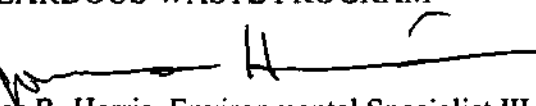
The Federal Facilities Section of the Hazardous Waste Program has reviewed the above referenced document and provides the enclosed comments. The department apologizes for the lengthy delay in completing the review and will strive to provide a more timely response in the future. The department looks forward to reviewing the Army's comment responses by June 1, 2002, and the final document by August 1, 2002.

The report indicates hazardous materials have been released at the site and hazardous wastes are present and currently uncontrolled. A remedial investigation will be necessary to define the vertical and horizontal extent of the contamination and develop a risk assessment in preparation for remediating the site. The department suggests the Army develop a remedial investigation work plan by August 2002 with fieldwork scheduled to begin by October 1, 2002.

If you have any questions regarding this letter, or need further information, you may contact me at (573) 526-2736.

Sincerely,

HAZARDOUS WASTE PROGRAM


James R. Harris, Environmental Specialist III
Department of Defense Unit

JH:dd

c: ✓ Mr. Tom Lorenz, USEPA

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SUPERFUND RECORDS

Missouri Department of Natural Resources Comments
On
Preliminary Assessment/Site Inspection Report
Former St. Louis Ordnance Plant
St. Louis, Missouri
Draft Revision 1.0
(October, 2001)

General Comments

1. The list of contaminants identified, and the levels at which they were found, indicates a Remedial Investigation must be conducted to define the vertical and horizontal extent of the contamination both on and off-site. The Remedial Investigation should satisfy EPA guidance for conducting Remedial Investigations.
2. The anti-static material on the walls, and the mastic used on the floor tiles, should be analyzed for PCBs during the Remedial Investigation.
3. The departments Cleanup Action Levels for Missouri should be added to Table 1-1 and used as preliminary remediation goals. Given the proximity of residences, and the Job Corps, which can be viewed as residence, a risk assessment is necessary to determine accurate cleanup objectives.
4. The department requests the Army provide a detailed description of the production processes that occurred at the Hanley area and a list of all materials used and stored at the Hanley area and their chemical composition.
5. The department would prefer the Army refer to the site as the manufacturing plant at the Hanley Area of the St. Louis Ordnance Plant (SLOP). The department believes this is a more accurate description since the preliminary assessment/site inspection (PA/SI) was not inclusive of the entire former plant and only a portion of the Hanley area at the SLOP.

Specific Comments

1. Section 2.1, 1st Paragraph: The document should also note the Job Corps property, and the remainder of the Sverdrup Army Reserve Center property that was not investigated, was also part of the Hanley Area.
2. Section 2.2, 1ST Paragraph: Some of the buildings in disrepair have experienced roof structural failure, potentially resulting in the release of asbestos to the environment and the surrounding populous.

Draft PA/SI Comments

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3. Section 2.2, Building 220: Is Building 220 still a part of the property owned by the 89th Regional Support Command (RSC) or does the Job Corps currently own and use the building?
4. Section 2.2, Building 218 Series: What compounds were used in the manufacture of tracer rounds?
5. Section 2.2, Building 219 Series: The department does not understand why powder loading was occurring in a primer production area. Please explain.
6. Section 2.3, 1st Paragraph: The department was under the impression the SLOP did not operate during the Korean War or the Vietnam War, but the St. Louis Army Ammunition Plant (SLAAP) did operate during these conflicts, producing 105 mm Howitzer shells. Is this incorrect?
7. Section 2.3, 2nd Paragraph: It is critical the Army determines what compounds Hanley Industry used, and where they were used, to be sure the list of potential contaminants of concern is complete. In addition, the Army should determine what Hanley Industry did with wastewaters generated during their tenure at the site, if the existing sewers and powder wells were not used.
8. Section 2.3, 3rd Paragraph: All the walls, floors and ceilings of the structures should be investigated during the Remedial Investigation to verify they do present an unacceptable risk and for waste profiling.
9. Section 2.4: The department does not have copies of any of these previous studies. The department requests a copy of each of the reports, including the USACE archive search report, be submitted for review and addition to our files.
10. Section 2.4.1: The site maps indicate there are 33 magazines and 19 powder wells in the current study area, where are the other 21 magazines and 9 powder wells USATHAMA surveyed in 1981?
11. Section 2.4.2: Were confirmation samples collected after the removal of PCB contaminated soils by USATHAMA in 1991? Does the army have documentation for the proper disposal of the PCB containing transformer? Have all the transformers, or other PCB containing devices, been removed from the site?
12. Section 2.4.2: Has the Army taken any steps to properly manage the asbestos, as was recommended by USATHAMA in 1991?

Draft PA/SI Comments
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13. Section 2.4.3: Since incineration occurred on the site, the department believes it is premature to exclude a potential contaminate(s) of concern. Future investigations should include SVOC analyses.
14. Section 3.2: The surface and subsurface soils immediately around all the 228, 227 and 219 series magazines should be sampled during the remedial investigation.
15. Section 3.3: The department would have preferred the samples from the backfilled sumps be analyzed, as the results would have documented the lack of contamination. Since the samples were not analyzed the army cannot document the wells are contaminate free. These sumps will have to be re-sampled and analyzed during the Remedial Investigation: -----
16. Section 3.4: Were soil samples collected at the location of all the sewer breaks?
17. Section 5.4.2, VOCs: MW-101 is located on property that has been under Army control since the construction of SLOP. This area was a part of the SLOP complex, and therefore will have to be investigated during the Remedial Investigation.
18. Section 6.2: Do the stormwater drains daylight into an open channel after the pipes leave the site?
19. Section 6.2: The department is not convinced that storm drains collect "all" runoff and none runs off the site. Stormwater samples should be collected to determine if contamination is leaving the site. Regardless of how the contamination is leaving, a permit is required to discharge contaminants.
20. Section 6.4.1: These results indicate an un-permitted discharge from the site is occurring.
21. Section 6.4.4: The lead levels found in some of the sediment samples strongly suggest these sediments are a hazardous waste.
22. Section 6.4.5: The lead levels found in some of the powder well sediment samples strongly suggests that some of these sediments are a hazardous waste.
23. Section 6.4.5: What are possible sources for the TPH found in PW-15 and PW22?
24. Section 6.5: The department is unconvinced that the storm drains capture all surface water and sediment. Numerous young men work and reside immediately behind the site, and may be currently being exposed to unacceptable levels of

contamination. The Remedial investigation must be expanded beyond the area within the site fence, both on and off Army property

25. Sections 7.0: During PA/SI site visits the department saw ample evidence that the site is not secure and is regularly visited by trespassers. It was apparent that trespassers are exposed to site soils, tunnel water, tunnel sediments and asbestos. Given the close proximity of the 219 series of buildings to the Job Corps it is *highly likely contamination is present on the Job Corps property and the students may be receiving unacceptable exposure.* Given the limited sampling even the groundskeeper may be causing hazardous waste to become airborne while mowing, and receiving inhalation and dermal exposure to hazardous waste himself.
26. Section 8.0: During site visits during the PA/SI the department saw ample evidence that the site is not secure and is regularly visited by trespassers. In addition, due to the dilapidated condition of the site buildings asbestos is exposed to the environment and is likely being released in violation of the departments air regulations.
27. Section 9.2: The department agrees that the groundwater pathway is likely incomplete, however, a Remedial Investigation will be necessary to determine the status of the surface water and air pathways and define the vertical and later extent of the contamination.